



7 Times Square, New York, NY 10036-6569 Tel: 212-421-4100 Fax: 212-326-0806

New York | Los Angeles | Miami

[www.pryorcashman.com](http://www.pryorcashman.com)

**Jeffrey Alberts**  
Partner

Direct Tel: 212-326-0800  
Main Fax: 212-326-0806  
[jalberts@pryorcashman.com](mailto:jalberts@pryorcashman.com)

May 5, 2023

**VIA ECF**

The Honorable Margo K. Brodie  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Tim Leissner, 18-CR-439 (MKB)***

Dear Chief Judge Brodie,

We write as counsel to Russell Simmons to assert an interest in the 3,325,942 shares of stock in Celsius Holdings, Inc. held in a J.P. Morgan Chase Bank brokerage account with an account number ending in "7002" in the name of Kimora Lee Simmons identified in the Amended Preliminary Order of Forfeiture entered in the above-captioned action on March 3, 2023. Our client's Verified Petition is enclosed. We appreciate the Court's attention to this matter.

Sincerely,

/s/ *Jeffrey Alberts*  
Jeffrey Alberts

Enclosure:

cc (by ECF):

AUSA Drew Rolle  
AUSA Dylan Stern  
AUSA Tanisha Payne  
AUSA Margaret Moeser